T.E. Murphy 1083 N. Collier Blvd #387 Marco Island, Florida 34145 239 393-0435 Tele/Fax



March 13, 2008

Kay Oshel, Director of the Office of Policy, Reports and Disclosure Office of Labor Management Standards US Department of Labor 200 Constitution Avenue, NW – Room 5609 Washington DC 20210

> Re: Proposed Rule Making – T1 Form RIN 1215-AB64

Dear Ms. Oshel:

My name is Thomas Murphy and I am an employer appointed trustee serving on the Board of Trustees of several Taft Hartley trust funds. I am employed as a consultant by Crowley Marine Services, Inc. It's my understanding that the US Department of Labor issued a Notice of Proposed Rulemaking on March 4, 2008 relative to a new T-1 reporting requirement. The proposal as it now stands would require that such a report be filed for all trust funds, *even those that already file 5500 forms* with the Department of Labor. In my opinion, the new rule, if adopted, will add another level of work for the staff employees administering the Plans which will ultimately result in higher cost to the employers.

Undoubtedly, you're aware; Taft Hartley funds are managed by an equal number of union and employer appointed trustees. I feel that extensive comments need to be filed on a central point in the Department's new rule. I disagree that contributions made by an employer to a trust on behalf of employees pursuant to a collective bargaining agreement with the union demonstrates union financial dominance. The current deadline for filing comments is April 18, 2008. The volume of work currently being done with respect to other Government filings required by mid-April leaves little time for the preparation of necessary and comprehensive comments on the proposed new rule.

Consequently, I am hereby requesting an extension of time to file comments to this proposal. I feel that an additional sixty (60) days should be granted to enable full participation from the regulated community. Your favorable consideration in granting the extension is respectfully requested.

Very truly yours, .

T.E. Murphy